



responding to Plaintiff's discovery requests, and traveling to and attending depositions while their Motion to Dismiss is pending—a dispositive motion that, if granted, would make discovery with respect to Individual Defendants wholly unnecessary; and (3) because fact discovery involving Individual Defendants would not aid in the resolution of Individual Defendants' fully briefed Motion to Dismiss. Further, staying discovery with respect to Individual Defendants while their Motion to Dismiss is pending would not prejudice Plaintiff or delay trial, which is set for September 9, 2019. For these reasons, as more fully outlined in the separate Brief In Support, Individual Defendants respectfully request that the Court grant its Motion for Protective Order to Stay Discovery. A Proposed Order is filed herewith.

Dated: July 15, 2018

Respectfully submitted,<sup>1</sup>

**REED SMITH LLP**

By: /s/ Tyree P. Jones Jr.  
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<sup>1</sup> Submission of this Motion for Protective Order to Stay Discovery, and the Brief In Support that is being filed contemporaneously, is intended solely for the purpose of preserving Individual Defendants' personal jurisdiction defenses and should not be construed as a general appearance or submission to this Court's jurisdiction.

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**CERTIFICATE OF CONFERENCE**

This is to certify that on July 6, 10, and 12, 2018, counsel for Individual Defendants conferred with counsel for Plaintiff. Counsel for Plaintiff OPPOSES the relief sought in this Motion. On July 10, 11, and 12, 2018, counsel for Individual Defendants conferred with counsel for Defendant Pacific Union Financial LLC. Counsel for Defendant Pacific Union CONSENTS to the relief sought in this Motion.

By: /s/ Tyree P. Jones Jr.  
Tyree P. Jones, Jr.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on this 15th day of July 2018, a true and correct copy of the foregoing Individual Defendants' Motion For Protective Order To Stay Discovery was submitted to the Clerk of the Court and served upon all counsel of record using the CM/ECF system of this Court.

By: /s/ Tyree P. Jones Jr.  
Tyree P. Jones, Jr.